REPLY TO:

- ☐ 135 HART SENATE OFFICE BUILDING WASHINGTON, DC 20510–1501 (202) 224–3744 www.grassley.senate.gov
- 721 FEDERAL BUILDING 210 WALNUT STREET DES MOINES, IA 50309-2106 (515) 288-1145
- 111 7TH AVENUE, SE, Box 13
 SUITE 6800
 CEDAR RAPIDS, IA 52401–2101
 (319) 363–6832

1102

United States Senate

CHARLES E. GRASSLEY

WASHINGTON, DC 20510-1501

December 14, 2017

REPLY TO:

120 FEDERAL BUILDING
320 6TH STREET
SIOUX CITY, IA 51101-1

SIOUX CITY, IA 51101-1244 (712) 233-1860

531 COMMERCIAL STREET WATERLOO, IA 50701-5497

(319) 232-6657

201 WEST 2ND STREET SUITE 720
DAVENPORT, IA 52801-1817 (563) 322-4331

307 FEDERAL BUILDING 8 SOUTH 6TH STREET COUNCIL BLUFFS, IA 51501–4204 (712) 322–7103

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Dear Chairman Pai:

It has come to my attention that 37 Iowa rural telecommunications companies representing 45 study areas have requested the Federal Communications Commission to allocate additional funding up to \$200/month per eligible customer location for all companies nationwide that voluntarily elected universal service funding under the Alternative Connect America Fund ("A-CAM") model. Attached please find a copy of the letter that they sent to the FCC. Iowa has the largest number of A-CAM electing companies and are working hard to meet the obligations laid out by the FCC. I ask that this request be given all due consideration.

Thank you for your time and prompt attention to this matter. Please do not hesitate to contact Sherry Kuntz in my Washington, D.C. office if I can help facilitate communication regarding this matter.

Sincerely,

Charles E. Grassley United States Senator

Committee Assignments:

AGRICULTURE BUDGET FINANCE November 8, 2017

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Via ECFS

Re: Ex Parte Communication, Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

The 37 undersigned Iowa rural telecommunications companies¹ ("Iowa A-CAM Companies") representing 45 study areas respectfully request the Federal Communications Commission ("Commission") to allocate additional funding up to \$200/month per eligible customer location for all companies nationwide that voluntarily elected universal service funding under the Alternative Connect America Fund ("A-CAM") model. In fact, Iowa is the state with the largest number of A-CAM-electing companies in the country, and the Iowa A-CAM Companies are already well under way with their deployment plans to meet the obligations laid out by the Commission.

Allocation of funding up to \$200/month per eligible location will reduce the locations designated "reasonable request" by 3,578 locations to only 2,632 locations. Furthermore, because of this funding, 2,615 additional locations in the state will receive service at 25/3 Mbps, while 2,453 additional locations will have increased service of at least 10/1 Mbps.

The Iowa A-CAM Companies point out that the Commission has already supported as Commission public policy A-CAM funding at \$200/month per location in the original rate-of-return carriers' reform order. Such an increase in funding will require no additional policy determinations by the Commission. Moreover, A-CAM Companies will be required to accept the additional buildout obligations under the conditions of the Order and Further Rulemaking issued in December 2016 should the Commission act by the end of 2017.

¹ The Iowa A-CAM Companies are listed in Attachment A.

² Connect America Fund; ETC Annual Reports and Certifications; Developing a Unified Intercarrier Compensation Regime, WC Docket Nos. 10-90 et. Al., Report and order and Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-33 (rel. March 30, 2016).

³ Connect America Fund, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-178 (rel. Dec. 20, 2016).

Ms. Marlene Dortch November 8, 2017 Page 2

Granting of A-CAM funding at \$200/month per location will also result in a prudent use of the Commission's budget by enabling companies to design their networks in a more efficient manner at the outset without costly redesign. In addition, the costs of deploying broadband technology initially are less than the costs of installing interim solutions that will need to be replaced later.

On behalf of the thousands of customers they serve, the Iowa A-CAM Companies urge the Commission to act expeditiously and fund the A-CAM model at \$200/month per eligible location by December 31, 2017.

Sincerely,

The Iowa A-CAM Companies

Cc: Chairman Ajit Pai

Commissioner Mignon Clyburn Commissioner Michael O'Rielly Commissioner Jessica Rosenworcel

Commissioner Brendan Carr

Attachment A

Attachment A Iowa A-CAM Companies

Barnes City Cooperative Telephone Company

Breda Telephone Corp.

Butler-Bremer Mutual Telephone Company

Coon Creek Telephone Company

Center Junction Telephone Company, Inc.

Coon Valley Cooperative Telephone Association, Inc.

Cooperative Telephone Company

Casey Mutual Telephone Company

Danville Mutual Telephone Company

East Buchanan Telephone Cooperative

Farmers Telephone Company-Essex

Farmers Mutual Cooperative Telephone Company-Harlan

Farmers Mutual Telephone Company-Jessup

Jefferson Telephone Company

La Motte Telephone Company

Lone Rock Cooperative Telephone Company

Mechanicsville Telephone Company

Modern Cooperative Telephone Company

Martelle Cooperative Telephone Association

Massena Telephone Company

Mutual Telephone Company of Morning Sun

Northwest Telephone Cooperative

Northeast Iowa Telephone Company

North English Cooperative Telephone Company

New Ulm Telecom, Inc.

Olin Telephone Company, Inc.

Onslow Cooperative Telephone Association

Rockwell Cooperative Telephone Association

Sac County Mutual Telephone Company

Schaller Telephone Company

Superior Telephone Cooperative

Templeton Telephone Company

Terril Telephone Cooperative

Titonka Telephone Company

Van Buren Telephone Co., Inc.

Western Iowa Telephone Association

Wyoming Mutual Telephone Company



FEDERAL COMMUNICATIONS COMMISSION WASHINGTON

February 13, 2018

The Honorable Charles E. Grassley United States Senate 135 Hart Senate Office Building Washington, D.C. 20510

Dear Senator Grassley:

Thank you for your letter on the importance of connecting additional rural consumers in Iowa to high-speed broadband. Your views are very important and will be entered into the record of our proceeding on the Connect America Fund and considered as part of the Commission's review.

In my first remarks to FCC staff as Chairman, I declared that my highest priority would be making sure every American who wants high-speed Internet access can get it. Rural Americans deserve the same digital access as those living in urban areas. A key way to reach this goal is by updating the high-cost universal service program to encourage cooperatives and other small, rural carriers to build more online infrastructure.

We need more deployment in sparsely populated rural areas if we're going to extend digital opportunity to all Americans. But I've heard from community leaders, Congress, and carriers that insufficient, unpredictable funding has kept them from reaching this goal. That is why I recently shared with my fellow commissioners an order that would promote more high-speed broadband deployment in rural areas. If adopted, it would provide over \$500 million in additional funding for cooperatives and small rural carriers—including those participating in the Alternative Connect America Model (A-CAM) plan. And it seeks public input on both further increasing support to current A-CAM recipients and on giving legacy rate-of-return carriers a new chance to elect model-based support. Increased funding will boost broadband deployment in rural America, and the accompanying reforms will put our high-cost system on a more efficient path, helping to ensure that every American can benefit from the digital revolution.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

Ajit V. Pai